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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

V.R. individually and on behalf of all others
similarly situated,

Plaintiff,

v.

LINKEDIN CORPORATION,

Defendant.

Case No. 5:24-CV-07399-EJD

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER TO RESET HEARING DATE AND SET
BRIEFING SCHEDULE FOR MOTION TO
DISMISS**

Pursuant to Civil Local Rule 6-2, Plaintiff V.R. (“Plaintiff”) and Defendant LinkedIn Corporation (“LinkedIn”) (collectively, “the Parties”), by and through their attorneys of record, stipulate and agree as follows:

WHEREAS, LinkedIn filed a motion to dismiss on January 27, 2025;

WHEREAS, Plaintiff filed a First Amended Complaint on February 12, 2025;

WHEREAS, the court terminated the motion to dismiss and vacated the March 6, 2025 motion hearing in *V.R. v. LinkedIn* on February 14, 2025;

WHEREAS, the Parties have agreed that Defendant shall file its motion to dismiss (“Motion”) by March 12, 2025; Plaintiff shall oppose the Motion by April 11, 2025; and Defendant shall file its reply by May 6, 2025;

WHEREAS, three of the five related cases involving LinkedIn’s Insight Tag pending before your honor are *V.R. v. LinkedIn*; *L.B. v. LinkedIn*, No. 24-cv-6832; and *J.P. v. LinkedIn*, No. 24-7586;

WHEREAS, LinkedIn filed a motion to dismiss in *L.B. v. LinkedIn* on October 25, 2024;

WHEREAS, LinkedIn filed a motion to dismiss in *J.P. v. LinkedIn* on November 22, 2024;

WHEREAS, the *L.B. v. LinkedIn*, *J.P. v. LinkedIn*, and *V.R. v. LinkedIn* cases each assert the same causes of action, name LinkedIn as the sole defendant, and involve the same counsel representing both plaintiffs and LinkedIn;

WHEREAS, the parties agree that *L.B. v. LinkedIn* and *J.P. v. LinkedIn* should be re-noticed for hearing simultaneously with the forthcoming motion to dismiss in *V.R. v. LinkedIn* on June 5, 2025.

NOW, THEREFORE, THE PARTIES JOINTLY STIPULATE AND REQUEST THAT:

1. The briefing schedule for the motion to dismiss in *V.R. v. LinkedIn* be as follows: Defendant shall file its Motion by March 12, 2025; Plaintiff shall oppose the Motion by April 11, 2025; and Defendant shall file its reply by May 6, 2025; and

2. The hearing on the motions to dismiss in *V.R. v. LinkedIn*, *L.B. v. LinkedIn*, and *J.P. v. LinkedIn* be scheduled for June 5, 2025.

1 **IT IS SO STIPULATED.**

2 Dated: February 25, 2025

COOLEY LLP

3
4 By: /s/ Jeffrey M. Gutkin

Jeffrey M. Gutkin

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6 Attorney for Defendant
LINKEDIN CORPORATION

7 Dated: February 25, 2025

BURSOR & FISHER, P.A.

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9 By: /s/ Sarah N. Westcot

Sarah N. Westcot

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11 Attorney for Plaintiff
V.R.

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13 **ATTESTATION**

14 Pursuant to Civil Local Rule 5-1 (i)(3) regarding signatures, I, Jeffrey M. Gutkin, hereby
15 attest that concurrence in this filing of this document has been obtained.

16 Dated: February 25, 2025

17 /s/ Jeffrey M. Gutkin

18 Jeffrey M. Gutkin

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

1. The briefing schedule for the motion to dismiss in *V.R. v. LinkedIn* be as follows: Defendant shall file its Motion by March 12, 2025; Plaintiff shall oppose the Motion by April 11, 2025; and Defendant shall file its reply by May 6, 2025; and

2. The hearing on the motions to dismiss in *V.R. v. LinkedIn*, *L.B. v. LinkedIn*, and *J.P. v. LinkedIn* be scheduled for June 5, 2025.

DATED: February 28, 2025



Hon. Edward J. Davila
United States District Judge